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	Fax: (775) 785-0087 Attorney for Defendant Renown Health
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

LUCERO SANCHEZ,

Plaintiff,

vs.

RENOWN HEALTH, a non-profit Nevada Corporation, and DOES 1-20, inclusive,

Defendant

Case No.: 3:21-cv-00352-MMD-CSD

ORDER GRANTING STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE JOINT PRETRIAL ORDER [SECOND REQUEST]

Plaintiff Lucero Sanchez and Defendant Renown Health (collectively, the "Parties"), by and through their counsel of record, hereby stipulate and agree that the deadline to file the Joint Pretrial Order ("JPTO"), which is currently set for June 10, 2024, be extended for a period of sixty (60) days until Friday, August 9, 2024, due to recent developments in this case described more fully below.

The Parties and their counsel attended a settlement conference on April 10, 2024, but were unable to resolve the case. Thereafter, counsel for the Parties began diligently reviewing the file to confer and prepare the JPTO. While doing so, defense counsel identified a discrepancy in the diaries produced by Plaintiff in this action. Defense counsel promptly notified Plaintiff's counsel of the discrepancy after the close of business on May 22, 2024. Counsel for the parties briefly discussed the issue by phone the following morning and Plaintiff's counsel filed a Motion to

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Plaintiff's counsel has represented to the Court that a fundamental breakdown in the attorney/client relationship has necessitated his request to withdraw as counsel in this case. Plaintiff's counsel has also denied having any knowledge that different versions of Plaintiff's diary existed. Plaintiff is expected to attend the hearing on June 7, 2024. However, her position and/or explanation regarding the existence of different versions of her diary is known only to her counsel at this time and protected from disclosure by the attorney-client privilege. Given the unknown circumstances of how different versions of Plaintiff's diaries were created and/or produced in this case, Defendant intends to oppose the Motion to Withdraw as Counsel and move for sanctions. Therefore, the results of the hearing regarding the Motion to Withdraw as Counsel are uncertain.

In light of these unusual developments, including the potential need for Plaintiff to secure new counsel to try the case, the Parties request a 60-day extension up to and including August 9, 2024, by which to prepare and file the JPTO. This stipulation is made in good faith and not for purposes of delay.

Dated: June 4, 2024 Dated: June 4, 2024

/s/ Luke Busby
LUKE BUSBY, ESQ
316 California Ave., #82

Reno, NV 89509

21 Counsel for Plaintiff

/s/ Sandra Ketner

SANDRA KETNER, ESQ.
Simons Hall Johnston PC
690 Sierra Rose Drive
Reno, Nevada 89511
Counsel for Defendant, Renown Health

ORDER

IT IS SO ORDERED.

Dated this <u>5th</u> day of <u>June</u> 2024.

U.S. District Judge